

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DAN CREPPS,)	
<i>individually and on behalf of all others</i>)	
<i>similarly situated,</i>)	No. 4:19-cv-02554-SEP
)	
Plaintiffs,)	Member cases:
)	19-cv-02556
v.)	19-cv-02558
)	19-cv-02703
CONOPCO, INC., d/b/a “UNILEVER,”)	19-cv-02704
DOES 1 through 10,)	19-cv-02723
)	19-cv-02726
Defendants.)	19-cv-02728

CONSENT MOTION TO TRANSFER AND COORDINATE PRE-TRIAL PROCEEDINGS

Pursuant to Local Rule 42–4.03, Defendant Conopco, Inc., d/b/a “Unilever,” (“Unilever”) hereby moves to transfer and coordinate proceedings in two other putative class actions currently pending in this District that are substantially similar to this case. Unilever has contacted Plaintiffs’ counsel, and he consents to the transfer of these actions to this Court.

On December 10, 2019, Judge White granted Unilever’s Motion to Transfer and Coordinate Pre-Trial Proceedings in eight cases involving antiperspirants:

- *Dan Crepps v. Conopco, Inc., d/b/a “Unilever,” et al.*, No. 4:19-cv-02554-SEP (E.D. Mo.) (“*Crepps II*”);
- *Dan Crepps v. Conopco, Inc., d/b/a “Unilever,” et al.*, No. 4:19-cv-02723-SEP (E.D. Mo.) (“*Crepps III*”);
- *Jamie Richards v. Conopco, Inc., d/b/a “Unilever,” et al.*, No. 4:19-cv-02556-SEP (E.D. Mo.) (“*Richards I*”);
- *Jamie Richards v. Conopco, Inc., d/b/a “Unilever,” et al.*, No. 4:19-cv-02558-SEP (E.D. Mo.) (“*Richards II*”);
- *Jamie Richards v. Conopco, Inc., d/b/a “Unilever,” et al.*, No. 4:19-cv-02726-SEP (E.D. Mo.) (“*Richards III*”);
- *Jamie Richards v. Conopco, Inc., d/b/a “Unilever,” et al.*, No. 4:19-cv-02728-SEP (E.D. Mo.) (“*Richards IV*”); and

- *Carla Been v. Conopco, Inc., d/b/a “Unilever,” et al.*, No. 4:19-cv-02703-SEP (E.D. Mo.) (“*Been I*”); and
- *Carla Been v. Conopco, Inc., d/b/a “Unilever,” et al.*, No. 4:19-cv-02704-SEP (E.D. Mo.) (“*Been II*”); and

These cases were consolidated under Case No. 4:19-cv-02554-SEP and ultimately transferred to this Court.

On May 20, 2021, Unilever removed another two cases with virtually identical claims involving antiperspirants. *See Fischer v. Conopco, Inc., d/b/a “Unilever,” et al.*, No. 4:21-cv-00582-JMB (E.D. Mo.); *Muller v. Conopco, Inc., d/b/a “Unilever,” et al.*, No. 4:21-cv-00583-SRW (E.D. Mo.) As detailed in the supporting memorandum, *Fischer* and *Muller* were filed by the same lawyer as the previously consolidated cases with complaints that are essentially copies of each other. For the sake of efficiency, consistency of ruling, and avoidance of unnecessary duplication of effort by the various judges assigned these cases, they should be transferred to this Court for coordinated pretrial proceedings. In compliance with Local Rule 42–4.03, a Notice of this Motion and copies of the supporting papers are being filed in the subject cases. Plaintiffs’ counsel consents to the transfer of these actions to this Court.

WHEREFORE, Defendant Unilever respectfully moves for an order transferring the following cases to this Court to be coordinated with this matter for pre-trial purposes only, pursuant to Federal Rule of Civil Procedure 42(a) and Local Rule 42–4.03:

- *Fischer v. Conopco, Inc., d/b/a “Unilever,” et al.*, No. 4:21-cv-00582-JMB (E.D. Mo.)
- *Muller v. Conopco, Inc., d/b/a “Unilever,” et al.*, No. 4:21-cv-00583-SRW (E.D. Mo.)

coordinating *Dan Crepps v. Conopco, Inc., d/b/a “Unilever,” et al.*, No. 4:19-cv-02554-SEP (E.D. Mo.) with this matter for pre-trial purposes only.

Dated: June 1, 2021

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/ James P. Muehlberger

James P. Muehlberger, #51346MO

Douglas B. Maddock, Jr., #53072MO

SHOOK, HARDY & BACON L.L.P.

2555 Grand Boulevard

Kansas City, MO 64108

Telephone: (816) 474-6550

Facsimile: (816) 421-5547

dmaddock@shb.com

jmuehlberger@shb.com

*Attorneys for Defendant Conopco, Inc., d/b/a
"Unilever"*

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2021 the foregoing document was served upon the following via the Court's electronic filing system:

Daniel F. Harvath
Harvath Law Group, LLC
75 W. Lockwood, Suite #1
Webster Grove, MO 63119
dhavath@harvathlawgroup.com

Attorney for Plaintiff

/s/ James P. Muehlberger